

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*

Priority Mail Package with Tracking Number

Postmarked August 1, 2024

Case No. 3:24-mj-00511

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Priority Mail Package, addressed to "OH, 45344".
90504" with a return address of "OH, 45344".
located in the Southern District of Ohio, there is now concealed *(identify the person or describe the property to be seized)*:

Controlled Substances, materials and documents reflecting the distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments paid for controlled substances.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. 841(a)(1)	Distribution and possession with intent to distribute a controlled substance
21 U.S.C. 846	Conspiracy to distribute/possess with intent to distribute a controlled substance
21 U.S.C. 843(b)	Use of a communication facility to commit a felony

The application is based on these facts:

SEE ATTACHED AFFIDAVIT

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days *(give exact ending date if more than 30 days)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Anthony Hutson

Applicant's signature

Anthony Hutson, USPIS Task Force Officer

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

Telephone _____ *(specify reliable electronic means).*

Date: August 2, 2024

City and state: Dayton, Ohio

Caroline H. Gentry
United States Magistrate Judge



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN THE MATTER OF THE SEARCH OF:
UNITED STATES POSTAL SERVICE
PRIORITY MAIL
PACKAGE TRACKING NUMBER
[REDACTED]

3:24-mj-00511
Case No. _____

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, **Anthony Hutson**, being first duly sworn, hereby depose and state as follows:

1. I, Detective Anthony Hutson, am employed by the Montgomery County Sheriff's Office and have been so since September of 1998. I have been assigned as a road patrol officer, a field training officer, and a K-9 handler and am currently a detective assigned to the Montgomery County Regional Agencies Narcotics and Gun Enforcement (R.A.N.G.E.) Task Force. I have extensive prior experience in investigating drug cases that resulted in successful prosecution of persons involved in trafficking of drugs, possession of drugs and other related offenses. I have been involved in narcotics related arrests, executed search warrants that resulted in the seizure of narcotics and participated in undercover narcotics purchases. Through training and experience, I am familiar with the manner in which persons involved in the illicit distribution and sales of controlled substances often operate. These subjects usually attempt to conceal their identities, as well as the locations at which they reside and where they store controlled substances and the illegal proceeds derived therefrom.

2. Through training and experience, I am familiar with the practices of narcotics distributors and sellers, whereby they attempt to conceal the true nature, source, and location of proceeds of illegal activity, commonly referred to as money laundering. I have been a Task Force Officer (T.F.O.) with the United States Postal Inspection Service since August 2021. I am presently assigned to the Cincinnati Field Office of the United States Postal Inspection Service, Pittsburgh Division, with investigative responsibility for Southern District of Ohio. Part of my responsibility involves investigating the illicit use of the United States Mails in the transportation

of narcotics, other dangerous controlled substances, and financial proceeds from, or instrumentalities used in, the sale of such narcotics and controlled substances (hereinafter, “Drugs and/or Proceeds”).

3. Based on my prior training and experience as a T.F.O. with the United States Postal Inspection Service, I have become aware that drug traffickers frequently use United States Priority Mail Express (overnight) or Priority Mail (2-3-day) to transport Drugs and/or Proceeds. Additionally, as a result of prior investigations, law enforcement training, and successful controlled-substance prosecutions involving the use of the United States Mail, I have learned of certain common characteristics and/or circumstances that indicate that a particular package may contain Drugs and/or Proceeds. These circumstances and/or characteristics include, but are not necessarily limited to, the following: the mailer uses different post offices on the same day to send packages, the return address is false or non-existent, the addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, the labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanate from the package, and the listed address is located in an area of known or suspected drug activity.

4. On August 1, 2024, Postal Inspectors intercepted a package (hereinafter “the Package”) at the Cincinnati Network Distribution Center (NDC). The Package is a Priority Mail large flat rate box, bearing tracking number [REDACTED], postmarked August 1, 2024, with the following address information:

Sender: [REDACTED]
[REDACTED]
[REDACTED]

Addressee: [REDACTED]
[REDACTED]
[REDACTED]

5. Through law enforcement training and experience, I know that Southern California is a known drug source location. Also, according to Postal Business Records, the Package was not mailed from Torrance California, but rather actually mailed from Dayton, OH 45405.

6. Inspector Rossiter performed a check in the CLEAR database for the addressee's information on the Package of "[REDACTED] CA 90504." According to CLEAR, there is a "[REDACTED]" that was previously associated with [REDACTED] CA 90504 in 2017. However, that individual is currently associated with an address in Texas. CLEAR is a law enforcement database that is used as a tool by investigators designed to link subjects to a particular address.

7. Inspector Rossiter also performed a check in CLEAR for the sender's information listed on the Package of "[REDACTED] OH, 45344." According to CLEAR, there is a "[REDACTED]" that was previously associated with [REDACTED] OH 45344 in 2016. However, that individual is currently associated with associated an address in Dayton, OH 45405. Also, according to CLEAR, [REDACTED] has a criminal history including possession of controlled substance and trafficking in controlled substance.

8. On August 2, 2024, I utilized my narcotics detection K9, Hank, to conduct a "free air" check of the outside of the Package. Prior to conducting the "free air" check, the Package was placed in a room with multiple similar and like packages. As set forth in the attached K9 affidavit, "Hank" alerted positively for the presence or odor of a narcotic or other controlled substance exuding from the Package. "Hank" is a properly trained and certified narcotics-detection canine.

9. Based on my prior law enforcement training and experience as a United States Postal Inspector, the Package's address information, including (i) no current association between the sender and return address, (ii) no current association between the addressee and the recipient address, and (iii) the positive alert of the narcotics-detection canine are all indicative of, and consistent with Drugs and/or Proceeds being present in the Package.

Therefore, a search warrant to open the Package is requested.

Respectfully submitted,

Anthony Hutson

Anthony Hutson
Task Force Officer
United States Postal Inspection Service

Subscribed and sworn to before me via telephone this 2nd day of August, 2024.

Caroline H. Gentry
Caroline H. Gentry
United States Magistrate Judge





UNITED STATES POSTAL INSPECTION SERVICE

PITTSBURGH DIVISION

OFFICER AFFIDAVIT

I, Deputy Anthony Hutson, am and have been employed by the Montgomery County Sheriff's Office since 1998. Among other duties, I am currently the assigned handler of narcotics detection canine "Hank" which is trained and certified in the detection of the presence or odor of narcotics described as follows:

Cocaine, Methamphetamine, Heroin, and their derivatives

On 08/02/2024, at the request of Postal Inspector ROSSITER, I responded to the DAYTON P&DC, where "Hank" did alert to and indicate upon: [describe item]
USPS Priority Mail Package tracking number 9 [REDACTED]

Which, based upon my training and experience and that of "Hank", indicates there is contained within or upon the above described item, the presence or odor of a narcotic or other controlled substance.

D. Gutierrez 101 8-2-24
(Signature, Badge #, and Date)

[Signature] 8/2/2024
(Witness/Date)

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